

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

YELLOWHAMMER FUND, on behalf of )  
itself and its clients, )  
Plaintiff, )  
v. ) Civil Action No. 2:23-cv-450-MHT

ATTORNEY GENERAL OF ALABAMA )  
STEVE MARSHALL, in his official )  
capacity, )

Defendant. )

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WEST ALABAMA WOMEN'S CENTER, )  
on behalf of themselves and their staff, et )  
al., )

Plaintiffs, )  
v. ) Civil Action No. 2:23-cv-450-MHT

STEVE MARSHALL, in his official )  
capacity as Alabama Attorney General, )

Defendant. )

**JOINT PROPOSAL FOR PROCEEDING WITH THE ABOVE-CAPTIONED CASE  
PURSUANT TO THIS COURT'S MAY 7, 2024 ORDER, ECF NO. 49, AND PROPOSED  
BRIEFING SCHEDULE**

On May 7, 2024, this Court entered an Order, ECF No. 49, setting a status conference for May 15, 2024, at 8:30 a.m. to discuss next steps in the above-captioned case and directing the parties to file proposals regarding how to proceed in this case. In response, the parties met and conferred and now submit this joint proposal. All parties agree that this matter may be resolved on

cross-motions for summary judgment, and jointly propose the following dispositive briefing schedule:

- May 20, 2024: Deadline for Defendant to file Answer(s) to Plaintiffs' Complaints
- July 10, 2024: Deadline for Opening Motions for Summary Judgment<sup>1</sup>
- August 10, 2024: Deadline for Oppositions to Motions for Summary Judgment
- August 30, 2024: Deadline for Replies in Support of Motions for Summary Judgment

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Pursuant to this Court's General Order and the Civil and Criminal Administrative Procedures regarding Electronic Case Filing, it is hereby certified that all signing parties have agreed to the electronic filing of this document by one party with electronic signatures of counsel for both Yellowhammer Fund and the West Alabama Women's Center, et al., Plaintiffs and for Defendant Steve Marshall.

Dated: May 10, 2024

Respectfully submitted,

/s/ Meagan Burrows  
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<sup>1</sup> As the Court acknowledged in its May 7, 2024 Order, Plaintiff Yellowhammer Fund has a pending motion for summary judgment (ECF No. 27). Plaintiff Yellowhammer Fund defers to the Court's preference as to whether it should proceed based on that already-filed motion and accompanying brief and address the issues identified in the Court's motion to dismiss order on reply or submit a supplement on those issue at the time of the opening motion for summary judgment deadline.

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**CERTIFICATE OF SERVICE**

I, Meagan Burrows, do hereby certify that a true and correct copy of the foregoing document was filed using the Court's CM/ECF system on this 10th day of May 2024, which will serve all counsel of record.

/s/ Meagan Burrows  
Meagan Burrows